

STATE OF FLORIDA



COMMISSIONERS:  
ART GRAHAM, CHAIRMAN  
JULIE I. BROWN  
DONALD J. POLMANN  
GARY F. CLARK  
ANDREW GILES FAY

OFFICE OF THE GENERAL COUNSEL  
KEITH C. HETRICK  
GENERAL COUNSEL  
(850) 413-6199

# Public Service Commission

Florida Power & Light Company  
Ken Hoffman, Esq.  
215 South Monroe St.  
Suite 810  
Tallahassee, FL 32301

## STAFF'S DATA REQUEST

[ken.hoffman@fpl.com](mailto:ken.hoffman@fpl.com)

Re: Docket No. 20180109-EI – Petition for initiation of formal proceedings for relief against Florida Power & Light Company regarding backbilling for alleged meter tampering and disconnection, by Terry A. Avera.

Dear Mr. Hoffman:

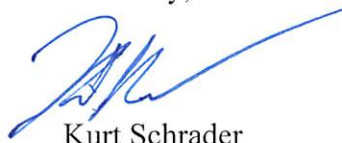
By this letter, Commission staff requests that Florida Power & Light Company (FPL) provide responses to the following data requests.

1. Has FPL offered Mr. Avera an energy audit since the replacement of his meter at his residence, 1755 NW 93rd St, Miami, FL, 33147, in April of 2017? If so, what was Mr. Avera's response?
2. Records provided by FPL in response to Mr. Avera's informal complaint indicate that Mr. Avera's kWh consumption increased significantly from 2013 until 2017 (17,153 kWh in 2013 versus 26,614 kWh in 2016). Please indicate why FPL feels it is appropriate to use data from 2017 when calculating consumption from a previous year utilizing the seasonal average method.
3. Prior to or on April 26, 2017, did anyone from FPL notify Mr. Avera that the meter at his residence was being replaced?
4. Please provide the following:
  - a. The 2017 seasonal average percentage per month for the region where the subject house, 1755 NW 93rd St, Miami, FL is located;
  - b. The monthly kWh consumption for 2010, 2011 and 2012 for the address 1755 NW 93rd St, Miami, FL, 33147 if available;

- c. FPL's calculations, in an electronic format, that resulted in the estimated back billing amount of 83,737 kWh along with an explanation of the process utilized by FPL to calculate this amount; and
  - d. Photographs of the meter number ACD5693 showing its condition before replacement depicting the broken/missing seal and the line side tap, if available.
5. How does FPL define the term "isolated outage"? Under what scenarios or situations may such an isolated outage occur?
  6. Does the 2011 isolated outage recorded at Mr. Avera's residence necessarily indicate meter tampering at that time? Can a meter be bypassed, as found in Mr. Avera's meter, without an isolated outage occurring?
  7. Please provide an explanation for the following:
    - a. The delay in discovering the unauthorized condition of the meter located at Mr. Avera's residence; and
    - b. The analytical tests that led to the discovery of the unauthorized condition of Mr. Avera's meter and the particular issues that may be identified in analytical tests of that nature.

Please file all responses electronically no later than June 26, 2018, from the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6234 if you have any questions.

Sincerely,



Kurt Schrader  
Senior Attorney

KMS/lms

cc: Office of Commission Clerk  
Frank L. Hollander, Attorney for  
Terry Avera